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6	

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

MICHAEL B. WADSWORTH,) Case No. 2:13-cv-00401-GMN-GWF
Petitioner,	<i>)</i>)
·	MOTION FOR
VS.	ENLARGEMENT OF TIME
	(FIRST REQUEST)
BRIAN E. WILLIAMS, et al.,)
	AND ORDER THEREON
Respondents.)

Respondents, by and through counsel, Adam Paul Laxalt, Attorney General of the State of Nevada, hereby respectfully move this Court for an order granting a forty-five (45) day enlargement of time, to and including September 3, 2015, in which to file and serve their answer to the remaining claims of Wadsworth's petition.

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

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There have been no prior enlargements of Respondents' time to file said answer, and this motion is made in good faith and not for the purposes of delay.

RESPECTFULLY SUBMITTED this 20th day of July, 2015.

ADAM PAUL LAXALT Attorney General

By: /s/ Jeffrey M. Conner JEFFREY M. CONNER Assistant Solicitor General

IT IS SO OF DERED.

Gløria M. Navarro, Chief Judge United States District Court

DATED: 07/23/2015.

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

MICHAEL B. WADSWORTH,) Case No. 2:13-cv-00401-GMN-GWF
Petitioner,)) DECLADATION OF COUNCEL
vs.) <u>DECLARATION OF COUNSE</u>) <u>JEFFRY M. CONNER</u>
BRIAN E. WILLIAMS, et al.,)
Respondents.))

I, JEFFREY M. CONNER, declare under penalty of perjury:

- 1. I am an Assistant Solicitor General employed by the Office of the Attorney General of the State of Nevada, and I make this declaration on behalf of Respondents' motion for enlargement of time in the above-captioned matter.
- 2. By this motion, I am requesting an enlargement of forty-five (45) days, to and including September 3, 2015, to file Respondents' answer to the remaining claims of Wadsworth's petition in compliance with this Court's order dated June 5, 2015. (ECF No. 50.) This is my first request for an enlargement with respect to this answer.
- 3. Since this Court ordered Respondents to answer Wadsworth's remaining claims, I have been busy working on other federal and state matters, including: *Nevada v. Torres*, Case No. 14A1064 (Supreme Court of the United States); *Rudin v. Myles*, 12-15362 (9th Cir.); *Camp v. Neven*, Case No. 13-

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15862 (9th Cir.); Elvik v. Baker, Case Nos. 13-17530 & 14-15126 (9th Cir.); Comstock v. Humphries
Case No. 14-15311 (9th Cir.); Gutierrez v. Williams, 2:10-cv-00109; Mack v. Baker, Case No. 3:12-cv-
00104; Redeker v. Neven, 2:12-cv-00397; Chavez v. LaGrand, Case No. 3:13-cv-00548; Rico-Arreold
v. Smith, Case No. 3:13-cv-00580; Lokken v. LeGrand, Case No. 3:13-cv-00608; Somee v. Hobbs, Case
No. 2:13-cv-01190; Sahagun v. Williams, 2:14-cv-00539; and Bergna v. Baca, 15-EW-0014-1B (First
Judicial District Court). Accordingly, Respondents respectfully request that this Court issue an order
granting them an enlargement of forty-five (45) days, to and including September 3, 2015, to file their
answer to Wadsworth's remaining claims.

- 4. I informed opposing counsel, Assistant Federal Defender Megan Hoffman, of my intention to seek an enlargement of time, and she indicated she has no objection to Respondents' request for additional time.
- 5. This motion for enlargement of time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Jeffrey M. Conner JEFFREY M. CONNER

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CERTIFICATE OF SERVICE I certify that I am an employee of the Office of the Attorney General and that on this 20th day of July, 2015, I served a copy of the foregoing MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST), by U.S. District Court CM/ECF electronic filing to: MEGAN C. HOFFMAN Assistant Federal Public Defender 411 East Bonneville Avenue, Suite 250 Las Vegas, Nevada 89101 /s/ Bonnie L. Hunt